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March 29, 2022

Hon. Paul A. Engelmayer
United States District Court
Southern District of New York
40 Foley Square, Room 2201
New York, NY 10007

Re: **Elizabeth Rodriguez v. United States of America, and Robert Solomon, M.D.**
Civil Action No.: 21-cv-2075 (PAE)

Dear Judge Engelmayer,

I am associated with Martin Clearwater & Bell LLP, attorneys of record for defendant Robert Solomon, M.D. ("Dr. Solomon"), in the matter referenced above. I write to respectfully request an extension of time for Dr. Solomon to oppose plaintiff's pending motion seeking a default judgment against Dr. Solomon.

In a previous order dated March 2, 2022, and filed under Docket No. 50, this Court directed Dr. Solomon to appear and file opposition papers by April 1, 2022, at 5 p.m. if he intended to oppose the motion. Dr. Solomon intends to oppose the motion, and my office is currently preparing opposition papers that will include an affidavit from Dr. Solomon. However, Dr. Solomon is currently out of the country and will not return until after April 1, 2022.

To permit Dr. Solomon sufficient time to review the opposition papers and execute the affidavit after he returns to the United States, I respectfully request that his time to oppose the default motion be extended to April 29, 2022. Dr. Solomon has not previously requested any adjournments or extensions of time in connection with this motion. The other parties to this action, including the plaintiff, consent to the requested extension of time.

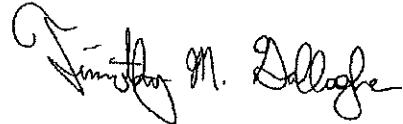
Thank you for your time and attention to this matter.

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Very truly yours,

MARTIN CLEARWATER & BELL LLP



Timothy M. Gallagher

TO: **BY E-MAIL**

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Granted.
SO ORDERED.



PAUL A. ENGELMAYER
United States District Judge
3/29/22